

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

RICHARD MOORE Pro Se

PLAINTIFF

V.

Cause No. 3:22cv092-GHD-JMV

Union County Mississippi Et Al

DEFENDANTS

Sheriff Jimmy Edwards Union County

Lee County Mississippi

Sheriff Jim H. Johnson

Deputy Bobby Bean

**PLAINTIFFS' COMPLAINT FOR DAMAGES, DECLARATORY AND INJUNCTIVE
RELEIF**

1. INTRODUCTION

1. The Lee County and Union County Sheriff's Office maintains and controls a network of citizens via community-oriented policing program. These citizens are allowed to commit crimes against the plaintiff at will with no fear of legal repercussions. Plaintiff currently has the Defendants in this court over similar Constitutional rights violations. The defendants have clearly demonstrated complete disregard for the Courts standing orders in two other case and continue to violate the Rights of the Plaintiff.

**2. PLAINTIFFS' RIGHTS UNDER FIFTH AND FOURTENTH ADMENDMENT OF
THE UNITED STATES CONSTITUTION WERE VIOLATED**

On May 04, 2022, over a dozen Union County Sheriff's Deputies converged onto

Moore was seen by a judge and bond was set at 15,000.00

Moore was still complaining of chest pains and the complaints were met

with jailers screaming at him saying "fuck you and you can sue me to if you want"

Moore's 80-year-old Mother living in Florida and recovering from a major surgery was once again being terrorized by what was being done to her son and she was very concerned about his medical complaints. Moore's Mother was told that her son was crazy, and they hung up on her. Moore was also cussed out by the Jail Administrator and was told he could "fucking sue him as well and that he was a goddamn liar"

Moore's Mother had to pay a bonding company \$1000.00 cash no-refund to save his life!

After 48 hours (about 2 days) in the custody of Lee County Moore was transported to Chickasaw County

Jail for more of the same. Once Moore was taken into booking Chickasaw county at once called an ambulance due to Moore's complaints of chest pains and numbness on the left side of his body, the same complaint given in Lee County. Moore was transported to Calhoun Baptist Hospital and later transported to Southaven Baptist Hospital where he was treated for a stroke. Moore continues to suffer from the incident that was forced and triggered by the trauma of Lee County Jail.

On May 4th, 2022, Union County Sheriff's Officials dispatched a tow truck from New Albany Towing and Recovery. Moore's car was towed to New Albany at an immediate charge of 225.00 and then according to the receipt "requested by Union County SO storage fee more than 500.00 plus added fees and taxes for a total of 860.23. Moore's vehicle was impounded for 11 days, and Moore is on a fixed disability income of 800, 00 per month and had to get a high interest loan to save his car. The first 4 days of this Moore was either in jail or the hospital. Once Moore was able to get someone to drive to Southaven to pick him up at a cost of 200.00 and return home he was unable to buy food and look for follow up medical attention.

Richard Moore's property at 1306 Hwy 9 North Blue Springs Mississippi, Union County.

Moore was told he was under arrest for an alleged crime of Felony Malicious Mischief in

Lee County. Union County officers already in one Federal Civil Action were once again a repeated pattern of criminal injustice against the plaintiff. Richard Moore was Handcuffed and was presented with no warrant for his arrest, only was told that

Investigator Bobby Bean of Lee County Sheriff's Department said there was a Warrant. Moore was then ordered to produce his key to his car that was parked and secure on in his carport. Moore was told that his car was going to be towed away because Bobby Bean had a search warrant. Moore was not presented with a search warrant either. Moore was then transported to Union County Jail and then Moore was picked up by a Lee County Deputy and transported to Lee County jail. Once Moore was booked into the jail, he was denied his medication for Anxiety and PTSD. Lee County was and is well aware of Moore's medical condition and demonstrated an abject indifference to his medical needs by refusing to allow him to have or receive his medication. Moore was not allowed a telephone call to his attorney nor family member to ask them to bring his medication to the jail. Moore was never shown an arrest warrant nor search warrant. Moore was harassed and taunted by the jailers and threatened with a tazer if he didn't stop complaining of chest pains. Moore was seen the next day after all night complaining with chest pains by a jail nurse. The jail nurse took Moore's blood pressure and was told he was in good health which was a lie. Nearly 24 hours after the arrest Moore was once again, faced with Bobby Bean the vindictive Defendant in on ongoing Federal action and told about a warrant he still wasn't presented with

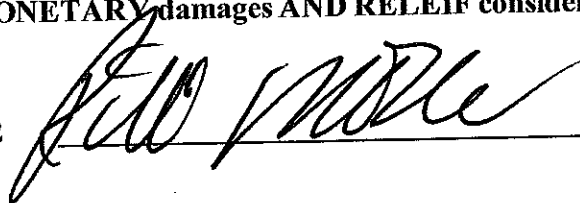
The search warrant that was talked about so much wasn't seen until Moore picked up his car. The warrant laying in the front seat. The WARRANT was signed and dated May 5, 2022 ONE DAY AFTER MOORE WAS ARRESTED AND HIS PROPERTY WRONGFULLY SEIZED AND REMOVED FROM HIS HOME. by a judge and on the reverse a handwritten list (incomplete) of items confiscated by Officer Bobby Bean. The handwritten return was also dated for May5, 2022. Bean confiscated three mobile cameras and data storage disk. These electronic devices as well as disk were ordered kept by both parties in two other ongoing Federal Civil actions Of this court. The defendants also access sensitive information about cases against themselves and it is no longer in the Plaintiffs control.

Plaintiffs Fifth and Fourteenth Amendment Rights were CLEARLY violated by denial of his Due Process of his liberty and property. This violation has caused considerable financial, emotional and physical harm. The harm caused to the Plaintiffs is IRREPABLE. Plaintiff is now in jeopardy of not being able to properly present his case and enjoy the Freedom of His Day In court due to the criminal negligence of the Defendants that clearly knew exactly what they were doing during the entire process of VIOLATING IN A WRECKLESS MANNER THE Plaintiffs Due Process and causing IRREPABLE harm by doing so. The defendants have proven a clear indifference to the rule of law and to this very court.

Plaintiff SEEKS MONETARY damages AND RELEIF considered proper by the Judge.

Dated May 19, 2022

Richard Moore



PLAINTIFF

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Union County Mississippi

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